

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WILMINGTON TRUST, NATIONAL
ASSOCIATION, AS TRUSTEE IN TRUST FOR
THE BENEFIT OF THE HOLDERS OF
HUDSON'S BAY SIMON JV TRUST 2015-HBS,
COMMERCIAL MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES
2015-HBS, BY SITUS HOLDINGS, LLC, IN ITS
CAPACITY AS SPECIAL SERVICER,

Plaintiff,

-v-

HUDSON'S BAY COMPANY, HUDSON'S
BAY COMPANY ULC, AND HBC L.P.,

Defendants.

Civil Action No.

LOCAL RULE 26.1 DEMAND

Pursuant to Local Civil Rule 26.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Wilmington Trust, National Association, as Trustee (the "Trustee") in Trust for the benefit of the Holders (the "Certificateholders") of Hudson's Bay Simon JV Trust 2015-HBS (the "Trust"), Commercial Mortgage Pass-Through Certificates, Series 2015-HBS, by Situs Holdings, LLC, in its capacity as Special Servicer ("Situs" or "Servicer"), demands that Defendants furnish a verified statement, within seven (7) days, setting forth information necessary to determine each of the Defendants' citizenship including:

- a. If the responding party is a natural person, that party's residence and domicile, and any state or other jurisdiction of which that party is a citizen for purposes of 28 U.S.C. § 1332;
- b. If the responding party is a partnership, limited liability partnership, limited liability company, or other unincorporated association, like information for all of its partners or members (including sub-partners and sub-members), as well as the state or other jurisdiction of its formation; and

- c. If the responding party is a corporation, its state or other jurisdiction of incorporation, principal place of business, and any state or other jurisdiction of which that party is a citizen for purposes of 28 U.S.C. § 1332.

Dated: May 18, 2020

LOWENSTEIN SANDLER LLP

By: /s/ Michael T.G. Long

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